

1 STEVEN W. MYHRE
2 Acting United States Attorney
3 District of Nevada
4 Neveda Bar Number 9635
5 KILBY MACFADDEN
6 Assistant United States Attorneys
501 Las Vegas Blvd. South, Ste. 1100
Las Vegas, Nevada 89101
Telephone: (702) 388-6336
Fax (702) 388-6698
kilby.macfadden@usdoj.gov

FILED

2017 JUL 26 AM 10:46

U.S. MAGISTRATE JUDGE

BY _____

7 *Representing the United States of America*

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 -oOo-

11 **UNITED STATES OF AMERICA,**

12 Plaintiff

13 vs.

14 **WILLIAM C. ETHERIDGE,**

15 Defendant

Magistrate No. 2:17-mj-00786-VCF

CRIMINAL COMPLAINT

Violations:

18 U.S.C. § 2113(e) – Bank Robbery
18 U.S.C. § 2119 – Carjacking

17 BEFORE a United States Magistrate Judge of the United States District Court
18 for the District of Nevada, the undersigned Complainant, being duly sworn, deposes and
19 states:

20 Count One

21 Bank Robbery

22 On or about July 25, 2017, in the state and federal District of Nevada and within
23 the jurisdiction of this Court,

WILLIAM C. ETHERIDGE,

defendant herein, by force and violence and by intimidation, did take from the person and presence of employees of WestStar Credit Union located at 110 East Harmon Avenue, Las Vegas, Nevada, approximately eighteen thousand and one hundred and twenty dollars (\$18,120) in United States currency belonging to and in the care, custody, control, management and possession of WestStar Credit Union, the deposits of which were then insured by the National Credit Union Administration, and subsequently forced a WestStar Credit Union employee to then accompany him without the consent of such employee as he attempted avoid apprehension for the commission of said offense, all in violation of Title 18, United States Code, Section 2113(e).

Count Two

(Carjacking)

On or about July 25, 2017, in the state and federal District of Nevada and within the jurisdiction of this Court.

WILLIAM C. ETHERIDGE,

defendant herein, with the intent to cause death or serious bodily harm, did take a motor vehicle that has been transported, shipped, or received in interstate or foreign commerce from a person or presence of another by force and violence and intimidation, all in violation of Title 18, United States Code, Section 2119.

PROBABLE CAUSE AFFIDAVIT

Complainant, Ryan S. Burke, as a Special Agent with the Federal Bureau of Investigation (“FBI”), states the following as and for probable cause:

1. Complainant has been employed as a Special Agent with the FBI since October 2012. Currently, Complainant is assigned to the FBI Las Vegas Violent Crime/Gang squad and is responsible for investigating crimes including but not limited to drug trafficking, kidnapping, extortion, bank robbery, carjacking, firearms offenses, as well as investigations into the activities and operations of criminal enterprises. Your Complainant has experience in conducting criminal investigations, including the investigation of criminal groups and conspiracies, as well as the collection of evidence and the identification and use of witnesses.

2. The information used to support this Complaint was derived from reports of information obtained from eye witnesses to the offenses described herein as well as investigations conducted by law enforcement related to the incident. This Complaint contains information necessary to support probable cause to believe that the criminal offenses described herein were committed by the defendant, **WILLIAM C. ETHERIDGE**, and is not intended to include each and every fact and matter observed by me or known to the Government. Moreover, to the extent that this Complaint contains statements by witnesses, those statements are set forth only in part and in substance and are intended to accurately convey the information, but not to be verbatim recitations.

SPECIFIC FACTS ESTABLISHING PROBABLE CAUSE

Count One

(Bank Robbery)

3. On July 25, 2017, at approximately 4:15 p.m., a subject entered the

WestStar Credit Union¹ located at 110 East Harmon Avenue in Las Vegas, Nevada. Upon entering the credit union, the subject approached a WestStar Credit Union employee working as a teller, VICTIM 1. The subject then lifted his sweatshirt to expose what was believed by VICTIM 1 to be a black, semi-automatic, compact pistol in his waistband and demanded money from VICTIM 1. The subject then removed the pistol from his waistband to display it to three additional WestStar Credit Union employees also working as tellers VICTIM 2, VICTIM 3, and VICTIM 4. The subject subsequently demanded money from VICTIM 2, VICTIM 3, and VICTIM 4 as well. Each of the victim tellers complied with the subject and provided United States currency to the subject.

4. After collecting money from each of the victim tellers, the subject demanded a ride in one of the victim tellers' personally owned vehicles in order to avoid apprehension by law enforcement. When none of the victim tellers volunteered to provide the subject with a ride, he demanded VICTIM 1 come from behind the teller window and provide him with transportation. VICTIM 1, fearing for his safety and the safety of the other WestStar Credit Union employees, came from behind the teller window at the subject's request and met with him in the lobby of the credit union. VICTIM 1 then informed the subject that he did not have the keys to his vehicle. Consequently, the armed subject instructed VICTIM 1 to exit the credit union with him and they both departed. The loss to WestStar Credit Union was approximately \$18,120.

Count Two

(Carjacking)

5. On July 25, 2017, immediately after exiting the WestStar Credit Union, the

¹ At all times relevant to this Complaint, WestStar Credit Union was insured by the National Credit Union Administration (“NCUA”).

1 subject approached a Toyota sedan, which had been transported, shipped, or received in
2 interstate or foreign commerce, and asked the driver VICTIM 5 for help. The vehicle was
3 also occupied by one other individual in the front the passenger seat VICTIM 6. VICTIM
4 5 assumed the subject was panhandling and declined to provide assistance to the subject.
5 The subject then brandished what VICTIM 5 believed to be a black, semi-automatic,
6 compact pistol and physically banged it against the driver side window while demanding
7 help. The subject then attempted to open the rear passenger door but it was locked.
8 VICTIM 5, fearing for his safety and the safety of VICTIM 6, unlocked the door. The
9 subject and VICTIM 1, who was still in fear for his life, then immediately entered the
10 motor vehicle and sat in the rear seats.

11 6. Upon entering the vehicle, the subject demanded that VICTIM 5 drive away
12 from WestStar Credit Union. VICTIM 5 complied with the subject's demand. The subject
13 provided driving directions to VICTIM 5 and they eventually entered onto Las Vegas
14 Boulevard traveling southbound. The vehicle was still occupied by the subject, VICTIM
15 1, VICTIM 5, and VICTIM 6. During transit, the subject conversed with the victims and
16 acknowledged he had just committed a robbery. The subject also expressed a desire to
17 find an auto dealership for the purpose of purchasing a vehicle with his robbery proceeds
18 so he could leave the area. Soon after, the vehicle approached the Harley Davidson
19 dealership located at 5191 South Las Vegas Boulevard in Las Vegas, Nevada. The
20 victims convinced the subject that he could purchase a motorcycle for use as a getaway
21 vehicle and so they stopped at the Harley Davidson dealership. The subject eventually
22 took off his grey sweatshirt and exited the vehicle with what appeared to be a pistol in a
23 backpack and stolen money. The victims then safely departed.

1 **IDENTIFICATION AND ARREST OF DEFENDANT**

2 7. After departing from the Harley Davidson dealership, VICTIM 6 called 911
3 to report the incident. Officers from the Las Vegas Metropolitan Police Department
4 (“LVMPD”) responded to the dealership and detained the defendant because he matched
5 the description of the subject from the WestStar Credit Union robbery. Simultaneously,
6 LVMPD detectives acquired surveillance footage from the WestStar Credit Union and
7 disseminated photographs of the subject to law enforcement officers at the Harley
8 Davidson dealership. LVMPD detectives and FBI agents reviewed the surveillance
9 footage and determined the defendant was in fact the individual detained at the Harley
10 Davidson dealership (See “Attachment 1 – Photograph from WestStar Credit Union” and
11 “Attachment 2 – Photograph from Harley Davidson”). At the time of detention, the
12 defendant had a black pellet gun that matched the description of what appeared to be a
13 pistol, as described by the victims and approximately \$20,905 in his possession.
14 Following interviews with the victims, the defendant was placed under arrest for Bank
15 Robbery and Carjacking.

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1 8. Based on the foregoing, there is probable cause that **WILLIAM C.**
2 **ETHERIDGE** committed the offenses of Bank Robbery and Carjacking, in violation of
3 Title 18, Section 2113(e) and Title 18, Section 2119, respectively.
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5 
6 Special Agent Ryan S. Burke
Federal Bureau of Investigation
7

8 SUBSCRIBED and SWORN to before me
9 This 26⁺ day of July 2017.

10 
11 HONORABLE CAM FERENBACH
12 UNITED STATES MAGISTRATE JUDGE
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1 **ATTACHMENT 1**
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3 Photograph from WestStar Credit Union
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2 **ATTACHMENT 2**
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5 Photograph from Harley Davidson
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